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12 Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC and
13 SONY NETWORK ENTERTAINMENT INTERNATIONAL
LLC

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18
19 QUENTIN REAVES, DANIELLE BOGAN, and
20 ROBERT MAYO, on behalf of themselves and all
others similarly situated,

21 Plaintiffs,

22 v.

23 SONY COMPUTER ENTERTAINMENT
24 AMERICA LLC, a Delaware Limited Liability
Company; and SONY NETWORK
25 ENTERTAINMENT INTERNATIONAL LLC, a
Delaware Limited Liability Company,

26 Defendants.

Case No. 3:11-cv-02254-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT ; ORDER**

Judge: Magistrate Judge Edward M. Chen

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 3:11-cv-02254-EMC

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
2 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
3 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-one (21)
4 putative class action lawsuits within this District, to date (collectively, the “N.D. Cal. Sony
5 Litigations”);

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
7 least eighteen (18) putative class action lawsuits pending outside this District, to date, including at
8 least six (6) suits in the Central District of California, one (1) suit in the Southern District of
9 California, one (1) suit in the Southern District of New York, two (2) suits in the Eastern District
10 of New York, one (1) suit in the District of Massachusetts, one (1) suit in the Eastern District of
11 Michigan, two (2) suits in the Southern District of Texas, one (1) suit in the District of
12 Connecticut, one (1) suit in the District of New Jersey, one (1) suit in the Northern District of
13 Ohio, and one (1) suit in the Southern District of Florida (collectively, with the N.D. Cal. Sony
14 Litigations, the “U.S. Sony Litigations”);

15 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
16 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
17 to date, and as to which other responses, including the Sony Defendants’ response, are due by
18 June 2, 2011.

19 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint in the
20 above-entitled action is June 1, 2011;

21 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
22 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
23 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
24 JPML;

25 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
26 by and through their respective counsel, hereby stipulate as follows:

27 The deadline for the defendants to respond to the Complaint in the above-captioned action
28 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict

1 litigation centralizing the above-captioned action with other matters, or if centralization is denied
2 by the JPML, then 30 days from the date of such order denying centralization.

3 Either party may seek ex parte relief from this stipulated Order for good cause shown,
4 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

5 Dated: May 17, 2011

6 MARK A. CHAVEZ
NANCE F. BECKER
7 CHAVEZ & GERTLER LLP

8 By: /s/ Mark A. Chavez/s/ [as authorized]
9 Mark A. Chavez

10 Attorneys for Plaintiffs
11 QUENTIN REAVES
12 DANIELLE BOGAN
ROBERT MAYO

13 Dated: May 17, 2011

14 HARVEY WOLKOFF
THAD A. DAVIS
15 ROCKY C. TSAI
ROPE & GRAY LLP

16 By: /s/ Rocky C. Tsai /s/
17 Rocky C. Tsai

18 Attorneys for Defendants
19 SONY COMPUTER
20 ENTERTAINMENT AMERICA LLC and
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

21 **[PROPOSED] ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23
24 Dated: 5/20/11

25 By: _____ State Judge
26
27
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